

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

John Doe,

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Plaintiff,

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v.

Case No. 1:21-cv-00944-JL
1:22-cv-00043-SM

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Town of Lisbon and New Hampshire
Department of Justice,

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Defendants.

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JOINT STIPULATION

The parties, by and through their respective counsel, submit the following stipulation and request that the Court enter an order approving this stipulation.

- a. The above-captioned cases shall be consolidated under case number 21-cv-944-JL and case number 22-cv-043-SM shall be statistically closed;
- b. Plaintiff's Motion to Voluntarily Dismiss without Prejudice (Case No. 21-cv-944-JL, Doc. #17) shall be GRANTED, and the Court shall dismiss the amended complaint originally filed in 21-cv-944-JL (Case No. 21-cv-944-JL, Doc. #6), proceeding in the consolidated matter on the complaint originally filed in 22-cv-043-SM (Case No. 22-cv-043-SM, Doc. No. 1-1) (the "Consolidated Complaint");
- c. Count III and IV of plaintiffs' Consolidated Complaint, and the remainder of the Counts to the extent any of them state a claim as against New Hampshire Department of Justice, and/or for declaratory and/or injunctive relief as against any party, shall be severed and remanded to state court; and
- d. That the Court terminate the Department of Justice's motion to dismiss as moot.

Respectfully submitted,

JOHN DOE
By his attorneys,
COOPER CARGILL CHANT, P.A.

Dated: April 18, 2022

By: /s/ Christopher T. Meier

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and

THE TOWN OF LISBON
By its attorney,
JACKSON LEWIS P.C.

Dated: April 18, 2022

By: /s/ Samuel H. Martin

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and

THE NEW HAMPSHIRE DEPARTMENT OF
JUSTICE

By its attorney,

JOHN M. FORMELLA
NEW HAMPSHIRE ATTORNEY GENERAL

Dated: April 18, 2022

/s/ Samuel Garland

Samuel R.V. Garland, Bar #266273
Senior Assistant Attorney General
Civil Bureau

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was serve on all counsel of record using the Court's electronic-filing system.

/s/ Christopher T. Meier
Christopher T. Meier